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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RAMON OCHOA,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,  
LLC; LEXISNEXIS RISK SOLUTIONS,  
INC.; FIRST ELECTRONIC BANK; AND  
SYNCHRONY LENDING, INC.,

Defendants.

Case No. 2:18-cv-01343-GMN-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO COMPLAINT**

**[SECOND REQUEST]**

COME NOW Plaintiff Ramon Ochoa ("Plaintiff") and Defendant Synchrony Bank ("Synchrony"), by counsel and pursuant to Local Rules 6-1 and 7-1, stipulate as follows:

**STIPULATION**

1. On July 20, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Synchrony was served with the Complaint on July 25, 2018.
3. Synchrony was originally due to file a response to the Complaint by August 15, 2018.
4. On August 15, 2018, counsel for Synchrony and Plaintiff jointly stipulated to extending Synchrony's deadline to file a response to the Complaint to September 5, 2018.
5. On August 17, 2018, the Court entered an Order granting the parties' joint stipulation [ECF No. 12].

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6. The Parties continue to engage in preliminary discussions in this matter. In order to explore the possibility of early resolution, counsel for Synchrony desires an extension until September 19, 2018, to file a response to the Complaint.

7. Counsel for Synchrony conferred with counsel for the Plaintiff regarding this Stipulation. Counsel for the Plaintiff does not oppose this requested extension.

8. The requested extension will allow the Parties time to potentially negotiate a resolution of this matter.

9. This Stipulation is filed in good faith and not for dilatory or other improper purpose. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension of time and has consented to the requested extension.

10. Granting this Stipulation is in the interests of justice and is otherwise the right and proper thing to do.

DATED: September 5, 2018.

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/s/ Sydney R. Gambee

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*Counsel for Plaintiff Ramon Ochoa*

**ORDER**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: September 6, 2028